

Serial No.: 09/929,735

Title: Communication Interface for a Financial
Modeling and Counseling System

In reply to Office action mailed: March 17, 2003

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REMARKS/ARGUMENTS

Claims 1-24 remain pending in the present application. No new matter has been added to the prosecution of this application.

For at least the reasons stated below, Applicants assert that all claims are now in condition for allowance.

PRE-AMENDMENT OBJECTIONS

In regard to pre-amendment B, filed 1/19/2002, Applicants has deleted the text suggested by the Examiner, as shown above. Accordingly, Applicants request withdrawal of the objection.

As to pre-amendment C, filed 12/17/2002, the Examiner is correct in that there was a claim numbering error. Applicants have amended the claims, as indicated above, to confirm the status pending claims. No claims were intended to be added, and original claims 8, 10, 19-21 and 24 are not canceled. The claims were just amended. Accordingly, Applicants request withdrawal of the objection.

DRAWING OBJECTIONS

Submitted herewith are formal drawings addressing the objections of the draftsperson in PTO Form 948. Accordingly, Applicants request withdrawal of the drawing objection.

CLAIM REJECTIONS UNDER 35 U.S.C. §102

Claims 1-5, 8, 9-13, 16, 17-21, and 24 are rejected under 35 U.S.C. 102(a) as being anticipated by the following press release, "KANA and Weblines Team to Provide Industry's Most Comprehensive Online Customer Interaction Solution"; Business Wire; New York; April 20, 1999, pages 1-3 [hereinafter *Weblines*]. The Examiner asserts that *Weblines* discloses all of the limitations of the above claims. The Examiner considers claims 1-5, and 8, and applies the same rationale in the analysis and rejection of claims 9-13, 16, 17-21, and 24. However, Applicants oppose the rejection of claims 1-5, 8, 9-13, 16, 17-21, and 24 based on the rationale detailed below.

Weblines discloses an open-architecture method for companies to integrate the Internet commerce, service and telephony infrastructures of their customer service centers. See *Weblines*, page 2. The *Weblines* system discloses sales, specifically e-commerce sales, and related customer service. See *Weblines*, page 1. Specifically, the primary objective behind the *Weblines* system is to use "each online customer interaction as an opportunity to solve problems and build relationships that result in increased sales." See *Weblines*, page 1. This is completely different than Applicants' invention, as claimed.

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Applicants' invention is an Internet-based financial modeling and counseling system used to assist a plurality of individuals with planning and achieving their financial goals. The present invention operates within a web-based environment whereby users may receive both automated and live coaching and guidance regarding their financial decisions. Specifically, the present invention claims a method, system and program means for web-based communication regarding financial modeling and counseling, including automated financial counseling, display of a plurality of communication options with a live advisor, and a communication means whereby the advisor may provide live financial coaching. See *Preliminary Amendment* dated August 13, 2001 (detailing method on pages 5-8 and Figures 2 and 3, system on pages 4 and 8-9 and Figures 1 and 4, and program on pages 9-22 and Figures 5-14). The primary objective of Applicant's invention is to provide counseling and advising such that user's may optimize their long-term financial goals. Applicant's invention is directly contrary to the teaching of *Webline* because the nature and type of information communicated and objectives behind the two systems are disparate. *Webline* discloses a system for increasing sales via a generic, web-enabled customer service center that focuses on optimizing sales transactions. This is not the same as the limitations of Applicants' claims, namely a system designed to assist users with long-term, continuous financial counseling and advising via automated and live web-based communications. With Applicants' invention, the user will have access to specialized, personal documents along with counseling from a trained individual to achieve their financial goals.

In summary, *Webline* fails to disclose or suggest all of the limitations of claims 1-5, 8, 9-13, 16, 17-21, and 24. Thus, the rejection of these claims is improper. Accordingly, Applicants request withdrawal of the 35 U.S.C. 102(a) rejection.

CLAIM REJECTIONS UNDER 35 U.S.C. §103

Claims 6-7, 14-15, and 22-23 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Webline* and in further view of *Schileru-Key*, US Patent 6,388,688. The Examiner asserts that the combination of *Webline* and *Schileru-Key* discloses all of the limitations of the above claims. The Office Action considers claims 6-7 and applies the same rationale in the analysis and rejection of claims 14-15, and 22-23. Applicants oppose rejection of claims 6-7, 14-15, and 22-23 based on the rationale detailed below.

As stated in the 35 U.S.C. 102(a) rejection above, *Webline* fails to disclose all limitations as claimed in the present invention. The combination of *Webline* with *Schileru-Key*'s teaching of a computer system and method of operation to allow navigation and exploration of spatial environments to enhance the observer's "view of the real environment represented by the virtual environment" fails to remedy the deficiencies of *Webline*, as discussed in the rejection above. (See *Schileru-Key*, column 2, lines 13-15.)

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As previously stated, *Webline* discloses a system for increasing sales at the transaction level via a generic, web-enabled customer service center. This is not the same as the limitations of Applicant's claims as set forth above. The distinguishing features of Applicant's invention are the user's access to specialized, personal documents and information along with counseling from trained individuals to achieve their financial goals.

The combination of *Webline* and *Schileru-Key* fails to disclose or suggest all of the limitations of claims 6-7, 14-15, and 22-23. Thus, the rejection of these claims is improper. Accordingly, Applicants request withdrawal of the 35 U.S.C. 102(e) rejection.

Conclusion

Applicants submit that all pending claims are allowable over the art of record, for at least the reasons discussed above, and respectfully request that a Notice of Allowance be issued in this case. If the Examiner believes that a conference would be of value in expediting the prosecution of this application, the undersigned can be reached at the telephone number listed below.

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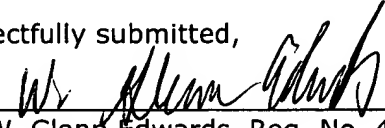
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Should any additional fees be necessary, the Commissioner is hereby authorized to charge or credit any such fees or overpayment to Deposit Account No. 50-1901 (Reference #60021-375702).

Respectfully submitted,

By


W. Glenn Edwards, Reg. No. 44,426
Customer No. 29838

Oppenheimer Wolff & Donnelly LLP
45 South Seventh Street, Suite 3300
Minneapolis, MN 55402
Telephone: 612-607-7278
Facsimile: 612-607-7100
E-mail: WEdwards@oppenheimer.com